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MotionPoint Corporation

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

TRANSPERFECT GLOBAL, INC.,
TRANSPERFECT TRANSLATIONS
INTERNATIONAL, INC., AND
TRANSLATIONS.COM, INC.,

Plaintiffs/Counterclaim
Defendants,

v.

MOTIONPOINT CORPORATION,

Defendant/Counterclaim
Plaintiffs.

Case No. CV 10-02590 CW

ELECTRONIC CASE FILING

**JOINT STIPULATION AND
[PROPOSED] ORDER MODIFYING
THE CASE SCHEDULE**

Judge: Hon. Claudia Wilken

Plaintiffs and Counterclaim Defendants TransPerfect Global, Inc., TransPerfect
Translations International, Inc., and Translations.com, Inc. (collectively "TransPerfect") and
Defendant and Counterclaim Plaintiff MotionPoint Corporation ("MotionPoint") hereby jointly

JOINT STIPULATION AND [PROPOSED]
ORDER MODIFYING THE CASE SCHEDULE

Case No. CV 10-02590 CW

1 move the Court to set certain filing and hearing dates.

2 During the June 30, 2011 motion hearing, the Court directed the parties to confer about
3 alterations to the case schedule in light of TransPerfect's First Amended Complaint. The parties
4 have conferred and request that the Court enter the following schedule:

5	Event or Filing	Joint Proposed Dates
6	Infringement Contentions for the Lakritz Patents (PLR 3-1)	August 12, 2011
7	Invalidity Contentions for the Lakritz Patents (PLR 3-3)	September 26, 2011
8	Exchange of Proposed Lakritz Terms for Construction (PLR 4-1)	October 10, 2011
9	Exchange of Preliminary Lakritz Claim Constructions and Extrinsic Evidence (PLR 4-2)	October 25, 2011
10	Joint Claim Construction and Prehearing Statement (PLR 4-3)	November 15, 2011
11	Advice of Counsel (PLR 3-7)	November 22, 2011
12	1) Fact Discovery Deadline 2) Parties to Designate Experts	December 14, 2011
13	Opening Expert Reports	February 3, 2012
14	Rebuttal Expert Reports	March 2, 2012
15	Expert Discovery Deadline	March 16, 2012
16	Plaintiff's Opening Brief on dispositive motions and claim construction due	April 5, 2012
17	Defendant's Oppositions to motions and claim construction, & Opening Brief on cross-motions due	April 19, 2012
18	Plaintiff's Reply to claim construction and motions, & Opposition to cross-motions due	May 3, 2012
19	Defendant's Reply to cross motions due	May 10, 2012
20	1) All case-dispositive motions to be heard at 2:00 P.M. 2) Case Management Conference	May 24, 2012
21	Final Pretrial Conference at 2:00 P.M.	August 7, 2012
22	8 day Jury Trial will begin at 8:30 A.M.	August 20, 2012
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24		
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1 Dated: July 20, 2011

McDERMOTT WILL & EMERY LLP

2 /s/ Alexander Ott

3 ANTHONY DE ALCUAZ (SBN: 65599)

4 PHILIP OU (SBN: 259896)

5 JOEL M. FREED

ALEXANDER OTT (admitted *pro hac vice*)

6 *Attorneys for Defendant/Counterclaim Plaintiff*

MotionPoint Corporation

7 Dated: July 20, 2011

KASOWITZ, BENSON, TORRES & FRIEDMAN LLP

8 /s/ L. Okey Onyejekwe Jr.

9 DOUGLAS E. LUMISH (Bar No. 183863)

10 JEFFREY G. HOMRIG (Bar No. 215890)

11 JOSEPH H. LEE (Bar No. 248046)

L. OKEY ONYEJEKWE JR. (Bar No. 250354)

12 *Attorneys for Plaintiffs/Counterclaim Defendants*

13 *TransPerfect Global, Inc.; TransPerfect Translations*

International, Inc.; and Translations.com, Inc.

14 **IT IS SO ORDERED.**

15 

16 Hon. Claudia Wilken

17 United States District Judge

1 I hereby attest pursuant to General Order 45.X.B. that concurrence in the electronic
2 filing of this document has been obtained from the other signatories.

3
4 Dated: July 20, 2011

/s/ Alexander Ott

Alexander Ott